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RECEIVED
FEDERAL ELECTION
COMMISSION

2016 MAY 19 PM 4: 27

May 12, 2016

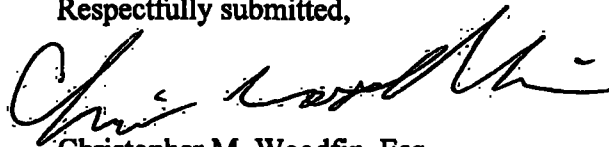
Office of General Counsel
Federal Election Commission
999 East Street, N.W.
Washington, D.C. 20463

MUR # CE 7269

Counselor:

The Tom Garrett for Congress Campaign (C00607101), by counsel, hereby submits the enclosed complaint against the named individual for violation of 11 CFR 110.11(b)(3).

Respectfully submitted,



Christopher M. Woodfin, Esq.
Attorney for Complainant
Virginia State Bar #84629

OFFICE OF GENERAL
COUNSEL

2016 MAY 19 PM 12: 14

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FEDERAL ELECTION COMMISSION

2016 MAY 19 PM 1: 58

In re: **Ronald L. Hedlund**

Glen Allen, Virginia 23060

Respondent,

OFFICE OF GENERAL
COUNSEL

COMPLAINT

Comes Now, Tom Garrett for Congress (C00607101), through Counsel, to file this complaint with the Federal Election Commission alleging that **Ronald L. Hedlund** did violate 11 CFR 110.11(b)(3) when he produced and mailed the attached letter (hereinafter referred to as "Exhibit A") to registered Delegates to the Fifth District Congressional Convention in the Commonwealth of Virginia.

1. The Tom Garrett for Congress Committee is registered with the FEC, mailing address P.O. Box 209, Ruckersville, VA 22968, and listed as the affiliated Committee for Thomas Alexander Garrett (hereinafter referred to as the "candidate").
2. The candidate is duly filed with the Fifth District Committee running for the Republican nomination for Congress in the Fifth Congressional District of the Commonwealth of Virginia.
3. The voting universe for the nomination consists of all voters certified by their local Republican Committee as delegates to the Fifth District Convention (hereinafter referred to as "Voters").
4. The Fifth District Republican Convention is being held on Saturday, May 14, 2016 in Lovingson, Virginia.
5. On or about May 11, 2016 Exhibit A was received by the Voters, constituting a public communication under 11 CFR 100.26.
6. Exhibit A states that it was sent "From the Desk of Ron Hedlund."

7. 11 CFR 110.11(b)(3) states that all public communications "not authorized by a candidate, authorized committee of a candidate, or an agent of either of the foregoing, the disclaimer must clearly state the full name and permanent street address, telephone number, or World Wide Web address of the person who paid for the communication, and that the communication is not authorized by any candidate or candidate's committee."

8. Exhibit A states that it was "[a]uthorized by Ron Hedlund," but does not state who paid for the production and distribution of the letter, nor included the necessary language pursuant to 11 CFR 110.11(b)(3).

WHEREFORE the Complainant requests the Federal Election Commission to investigate and take appropriate action against Ronald L. Hedlund for violation of 11 CFR 110.11(b)(3).

Respectfully submitted,



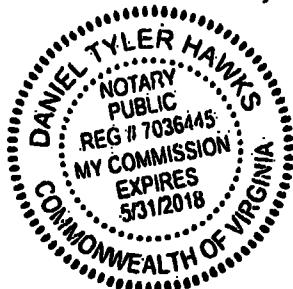
Christopher M. Woodfin, Esq.
Counsel For Complainant (VSB #84629)
157 Nina Lane
Williamsburg, VA 23188

Commonwealth of Virginia)

County/City of HENRICO)

On this, the 12 day of MAY, 2016, before me a notary public, CHRISTOPHER M. WOODFIN personally appeared, known to me (or satisfactorily proven) to be the person whose name is subscribed to the instrument, and acknowledged that he executed the same for the purposes therein contained.

In witness hereof, I herunto set my hand and official seal.




Notary Public

Expires: 5/31/2018

From the Desk of Ron Hedlund:

Ron Hedlund

Glen Allen, VA 23060

Who is the Establishment choice for Congress in the open seat in Virginia's 5th District?

We know that the Establishment is not ignoring the 5th District race. They *NEVER* allow a Congressional seat to go unchallenged. So who is the Establishment pick in the 5th District?

Follow the money. This will answer most questions in politics.

As someone who worked for both Governor George Allen and Governor Jim Gilmore in the 1990s, I have known the members of the Cantor machine since Eric Cantor was in the House of Delegates. Later, I became an early and integral member of the "Brat Pack" that helped Dave Brat achieve his stunning victory against Eric Cantor in June 2014.

I have lived in Henrico County for over 20 years, and I know exactly how Ray Allen and the Cantor machine operate.

Let's look at the facts by simply following the money:

July 2011- Bill Janis donates \$33,000 to Tom Garrett's campaign for State Senate.¹

Bill Janis is one of the most loyal members of the Cantor machine. At the time, Janis served in the House of Delegates as the House Majority Whip. He was a key member of the Cantor machine in Cantor's home turf, Henrico County. The \$33,000 was Cantor affiliated money.

December 2011, January 2012, and September 2012- Tom Garrett donates \$17,000 to Bill Janis's Independent campaign for Henrico Commonwealth's Attorney²

Matt Geary, the Republican nominee for Commonwealth's Attorney would not go along with the demands of the Cantor machine after winning the Republican primary. As a result, Cantor pulled Janis out of the House of Delegates to run for Henrico Commonwealth's Attorney as an independent. Janis, with the help of \$40,000 from Cantor, ran a nasty campaign against the Republican candidate. The Democrat won and Matt Geary committed suicide two months later.³

Tom Garrett was the fifth largest donor to the Janis campaign. The directive for the donation likely came from Eric Cantor. Tom Garrett was returning the favor for Bill Janis's \$33,000 donation to his campaign in 2011. In fact, according to the current RPV party plan, Tom Garrett would have been kicked out of the Republican Party for supporting an independent.

2014- Tom Garrett endorses Eric Cantor in his race against Dave Brat. Praises Eric Cantor as a "Constitutional Conservative" and "conservative leader"⁴

This race separated the men from the boys. Garrett claims he supported Cantor because Cantor helped him defeat the Democrat in 2011. Returning the favor? He says that he didn't know who Dave Brat was. Really? 36,110 voters knew who Dave Brat was. He says that he didn't write the press release where he called Cantor a constitutional conservative, he just signed it. Really? You sign off on an endorsement because someone tells you to sign it.

Continued on next page →

¹ <http://www.vpap.org/committees/198278/donor/124661/>

² <http://www.vpap.org/committees/205875/donor/198278/>

³ http://www.richmond.com/news/article_806f80cb-7c0a-55d4-82f3-18388be42cb9.html

⁴ <http://www.votetomgarrett.com/wp-content/uploads/2014/10/Press-Release-Bratt-Claims-Nomination-in-7th-District.pdf>

Authorized by Ron Hedlund, an original Brat packer working to ensure the 5th District sends a Constitutional Conservative ally of Dave Brat to Washington

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He says that he didn't stay neutral because that would be like "punching a grizzly bear in the face." There are a lot of grizzly bears in Washington Tom.

March and June 2015- Tom Garrett donates \$21,000 to Bill Janis's campaign for State Senate against the conservative, grassroots candidate Vince Haley⁵

December 23rd, 2015- Tom Garrett announces his campaign for Congress within minutes of Robert Hurt's retirement⁶

I find it hard to believe that Tom Garrett would have a press release ready, endorsements lined up, etc., within minutes of Robert Hurt's surprise retirement announcement without having any advance knowledge of Hurt's intentions.

2016- Tom Garrett's March 31st FEC Report⁷

\$1,000 donation from Tom Farrell, Chief Executive Officer of Dominion Power⁸

Tom Farrell does not donate for the love of God and country. He donates strategically for his business. Over the last four years, he has donated to John Boehner, Eric Cantor, Paul Ryan, and Don Beyer among others.

\$15,455 from members of the Virginia legislature including Cantor ally, Manoli Loupassi⁹

Almost the entire Republican legislature and party bosses included, are behind Garrett. He is the Republican Party of Virginia's pick for this seat. This is the same RPV Chairman, John Whitbeck, who ordered RPV Executive Director, John Findlay, to write a \$3,050 check from his Virginia Victory Fund to try to defeat Brat supporters from winning state central committee seats and successfully defeated the "Brat Pack" supporter for Henrico County GOP chairman.

2016- Tom Garrett threatens to endorse incumbent 5th District Chair over possible conservative challenger

I believe that a Congressman has no business getting involved in local unit and district politics. This happened all too often with Eric Cantor and is exactly what Robert Hurt did when he actively supported John Berkley for chair over Mark Lloyd. Garrett has shown that he will likely play the same Establishment my way or the highway games if he is elected to Congress.

I believe that the evidence is conclusive that Tom Garrett IS the Establishment choice for the 5th District Congressional seat. It is my belief that the Establishment realizes that an Eric Cantor-type candidate is not electable in the current anti-Establishment political environment. They are backing a candidate who claims to have anti-Establishment bona fides BUT who has shown a predisposition to work with them.

Like Bill Janis, Tom Garrett has a history of not showing up for critical votes. He did not show up to vote for or against SB 490, the *Uniform Military and Overseas Voters Act* which would have granted the men and women serving our country overseas the ability to vote electronically in Virginia elections. The vote died in committee after a 5-6 tie. Also, Tom Garrett campaigned at the Republican State Convention in Harrisonburg but did not participate in the process as a delegate. If Tom Garrett does not have the courage to take a tough public vote in Harrisonburg, then why do we think he is going to be willing to take a tough vote in Washington?

Sincerely,

Ron Hedlund - a concerned citizen of the 7th District hoping the 5th District will send an anti-Establishment ally of Dave Brats' to Washington.

⁵ <http://www.vpap.org/committees/255491/donor/198278/>

⁶ http://www.richmond.com/news/virginia/government-politics/article_43a99d79-9dd4-5a03-b0c6-288dbea684d3.html

⁷ <http://www.fec.gov/fecviewer/CandidateCommitteeDetail.do>

⁸ <http://docquery.fec.gov/cgi-bin/fecimg/?201604199012590222>

⁹ <http://www.fec.gov/fecviewer/CandCmteTransaction.do>

Authorized by Ron Hedlund, an original Brat packer working to ensure the 5th District sends a Constitutional Conservative ally of Dave Brat to Washington

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